



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES

-please note our new name-

DEPARTMENT OF ENVIRONMENTAL PROTECTION

DEP

208 West Third Street, Suite 101

Williamsport, PA 17701-6510

January 26, 1996

Northcentral Regional Office

Ralph Agnoni
Canton Manufacturing
120 East Second St.
P.O. Box 97
Canton, PA 17724-0097

Re: Hazardous Waste Manifest Violation
Canton Manufacturing
EPA ID# PAD 987342078
Canton Borough, Bradford County

NOTICE OF VIOLATION

Dear Mr. Agnoni:

On May 16, 1995, Canton Manufacturing consigned for transport a shipment of hazardous waste (D001), using the Uniform Hazardous Waste Manifest document No. NYB 692564 4. The waste was transported by Northeast Environmental Services, Inc., to their facility of Wampsville, NY.

During a hazardous waste inspection, conducted on January 10, 1996, the Department determined that the manifest lacked the total quantity of hazardous waste, transported offsite (item No. 13). Accordingly, Canton Manufacturing violated the provisions of 25 Pa. Code §§ 262.20(a)(g)(8). Further, it is the responsibility of the generator, of the hazardous waste, to ensure that all of the appropriate information is provided on the manifest.

This Notice of Violation does not waive, either expressly or by implication, the power or authority of the Commonwealth of Pennsylvania to prosecute for any or all violations of law arising prior to or after the issuance of this Notice of Violation or the conditions upon which this Notice of Violation was based, nor shall this Notice of Violation be construed so as to waive or impair the rights of the Department of Environmental Protection heretofore or hereafter existing.

Mr. Agnoni

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January 26, 1996

If you have any questions concerning this matter, please feel free to contact me at (717) 327-3727.

Patrick Brennan

Patrick Brennan

Solid Waste Specialist

PHB/sks

cc: Regional File
Compliance

~~EPA~~
Field

- _____ a. Treatment or disposal at permitted on-site facility.
Permit Number _____ Treatment _____ Disposal _____
- _____ b. Delivered to a PA haz. waste facility. Name of facility: _____

- _____ c. Delivered to a PA municipal or residual facility with Form S approval. Name of facility: _____

- ☒ d. Delivered to an approved out-of-state facility. Name of facility: _____
Northeast Environmental Service, Inc.
- _____ e. Delivered to a reclamation, reuse, or recycle facility. Name of facility: _____

INSPECTION REPORT COMMENTS

Date of Inspection January 10, 1996 Identification Number PAD987342078

Company/Facility/Site Name Canton Manufacturing Corp.

On January 10, 1996, I conducted a routine inspection at the
above mentioned facility. Ralph Agnoni was present. Canton Mfg. utilizes
injection molds & extrudes plastic parts for Shop Vac Inc. The
facility notified, with the EPA, in April of 1994, as a small
quantity generator of hazardous waste. The production area &
waste storage area were toured ^{during} ~~on site~~ the inspection.

The following violations were observed:

\$ 262.20(a)(8): Manifest No. NYB692564-4, dated 5-16-95,
displayed that the generator failed to include the total quantity
of hazardous waste (Block 13) shipped. The generator also
signed the manifest in Block 20 & not block 16. The TSD facility
also signed block 20.

As of May/1995 the facility ^{has been} ~~was~~ managing some of their
spill cleanup waste as a D001 hazardous waste. On May 9, 1995,
they received a letter, from their TSD facility ^{indicating} that a load of
the same waste was hazardous for ignitability. The waste was
shipped offsite on 4-12-95. Previously this waste stream was
non-hazardous & consists of hydraulic oil, Ethylene Chloride & H₂O.
It was recommended that Canton Manufacturing re-evaluate
their waste determination for this waste stream. I also inquired on
why the flashpoint was below 140° F. Upon doing so, Mr.
Agnoni indicated that he was informed, by Jim Moyer (Production
Manager), that during the Spring of 1995 the production machinery
~~was~~ ^{was} cleaned with Toluene. The residue was collected & managed
as the Spill Cleanup waste. Because of the May 9, 95 letter,

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Ralph Agnoni Date 1/12/96

Inspector (signature) Pat Brunner Date 1/12/96

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection Jan. 10, 12, 96 Identification Number PAD987342078Company/Facility/Site Name Carlson Manufacturing

From the TSD Facility, Mr. Agnori had determined that this waste stream was a hazardous waste. As of Jan. 11, 1996, he has determined that this waste stream is non-hazardous.

On Jan. 12, 96, he displayed results of analysis, provided by Northeast Environmental Services, Inc., indicating that the flashpoint, for the shipments after May/95, ^{are} ~~is~~ greater than 200°F. Previous analytical data includes TCLP.

Be advised, it is the responsibility of the generator, of a waste, to make an accurate determination, of a waste stream, prior to the shipment offsite. SEE §262.11 of PA Rules & Regulations.

It was recommended that the liquid waste, which is currently stored adjacent to a bay door, be relocated. This would help prevent any accidental discharges to the ground. Mr. Agnori indicated that he may ^{install} ~~install~~ a protective berm at the doorway.

The facility has decreased the amount of toluene utilized onsite. The printing operation is no longer used. An apparatus which utilizes heat to transfer print from tape to the product is used. A small amount of toluene is used to clean a bed transfer of print onto the product.

Note: The inspection was completed on January 12, 1996.

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Person interviewed (signature) Ralph Agnori Date 1/12/96
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